

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION**

CHRISTINE THOMSEN, DONNA  
MILLER, SHELBI FARRINGTON,  
DIANNA KOMETH, SALLY  
LABREE, HARRY PETERSON,  
PATRICK BURNHAM, DAVID  
TEVERBAUGH, RICHARD  
JOURNAGIN, GALE MARIE  
JACKSON, EDWARD CABLE,  
CAROLE DANGELO, SOPHIA  
MARKS, ALBERT SHEARER, and  
REBECCA YOUNK, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

MORLEY COMPANIES, INC.

Defendant.

Case No. 1:22-cv-10271-TLL-PTM  
Hon. Thomas L. Ludington  
Hon. Patricia T. Morris

**UNOPPOSED MOTION**

**UNOPPOSED MOTION FOR LEAVE TO FILE ENLARGED BRIEF IN  
SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

The undersigned counsel certifies that counsel communicated with opposing counsel, via email on August 17-18, 2022, explaining the nature of the relief to be sought by way of this Motion and seeking concurrence in the relief; Defendant's counsel responded that they do not oppose this Motion and the relief requested herein.

Plaintiffs Christine Thomsen, Donna Miller, Shelbi Farrington, Dianna Kometh, Sally LaBree, Harry Peterson, Patrick Burnham, David Teverbaugh, Richard Journagin, Gale Marie Jackson, Edward Cable, Carole Dangelo, Sophia Marks, Albert Shearer, and Rebecca Younk (collectively, "Plaintiffs"), through their counsel, hereby moves the Court for leave to file an enlarged brief, not to exceed 40 pages, in support of their Unopposed Motion for Preliminary Approval of Class Action Settlement. In support of this Motion, Plaintiffs state as follows:

1. As set forth in Plaintiffs' forthcoming Unopposed Motion for Preliminary Approval of Class Action Settlement, the Parties have reached agreement on a class-wide settlement, which, if approved, will fully and finally resolve all claims against Defendant Morley Companies, Inc.

2. Plaintiffs have made their greatest effort to keep their brief in support as succinct as possible. However, Plaintiffs believe in good faith that the filing of a brief in excess of 25 pages is necessary to fully and effectively (i) set forth the material terms of the Parties' Settlement Agreement; (ii) demonstrate that the

proposed Settlement Class warrants certification under Rule 23(b)(3) for settlement purposes; and (iii) demonstrate that the Parties' proposed Settlement warrants preliminary approval under Rule 23(e) and relevant Sixth Circuit precedent. *See* E.D. Mich. LR 7.1(d)(3)(A). As such, Plaintiffs' forthcoming Unopposed Motion for Preliminary Approval of Class Action Settlement will be a maximum of 40 pages in length, inclusive of signatures.

WHEREAS, Plaintiffs respectfully request that the Court enter an Order granting them leave to file an enlarged brief, not to exceed 40 pages, in support of their Unopposed Motion for Preliminary Approval of Class Action Settlement.

August 18, 2022

Respectfully Submitted:

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**BRIEF IN SUPPORT OF  
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Plaintiffs, by and through their undersigned attorneys, and in support of their  
Unopposed Motion For Leave to File Enlarged Brief in Support of Plaintiffs'

Unopposed Motion For Preliminary Approval of Class Action Settlement, relies on the content of Plaintiffs' Motion.

Respectfully Submitted,

August 18, 2022

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**CERTIFICATE OF SERVICE**

I, Sharon S. Almonrode, an attorney, hereby certify that on August 18, 2022, I served the above and foregoing on all counsel of record by filing it electronically with the Clerk of the Court using the CM/ECF filing system.

/s/ Sharon S. Almonrode

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